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January 14, 2025

VIA ECF

The Honorable George B. Daniels
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: **Hall-Landers v. New York University, No. 1:20-cv-3250-GBD-SLC**
NYU's Letter in Response to Plaintiff's Motion to Seal (ECF No. 189)

Dear Judge Daniels:

Pursuant to Rule 1(d)(ii)(1) of Your Honor's Individual Rules and Practices, defendant New York University ("NYU") writes in response to the plaintiff's Letter Motion to Seal (ECF 189, "Letter").

NYU respectfully requests that the Court seal pages 69-70 of the deposition transcript of Anthony Bonano, dated May 13, 2024, that Plaintiff referenced in their Objection to Magistrate Judge Cave's Report and Recommendation ("Objection") at page 9 and submitted as Exhibit 21 to the Declaration of Sarah N. Westcot in support of Plaintiff's Motion for Class Certification (ECF No. 124-21). It is "appropriate to seal ... sensitive proprietary or financial information." *Gaffney v. Muhammad Ali Enters., LLC*, 2023 U.S. Dist. LEXIS 229934, at *6 (S.D.N.Y. Dec. 21, 2023) (Daniels, J.) (granting motion to seal financial information); *see also Capri Sun GmbH v. Am. Bev. Corp.*, 2021 U.S. Dist. LEXIS 121094, at *5 (S.D.N.Y. June 4, 2021) (so-ordering motion to seal; "Confidential corporate financial documents and budgets are among those documents frequently recognized by this Court as appropriately sealed"). So too here. Plaintiff's Ex. 21 contains commercially sensitive information reflecting the amount of tuition paid to NYU for Spring 2020.

NYU does not request that the Court seal any other materials that the plaintiff filed under provisional seal in their Objection. The plaintiff's counsel did not apprise NYU of the materials at issue until late in the afternoon the day before the filing and NYU had not completed its analysis when the plaintiff filed their Objection. Now, having sufficient time for review, NYU confirmed that it would only seek to seal Ex. 21 and informed the plaintiff by e-mail dated January 13, 2025.



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NYU thanks the Court for its attention to this matter and will make itself available should the Court have any questions.

Respectfully submitted,

/s/ Keara M. Gordon
Keara M. Gordon

cc: All Counsel of Record (via ECF)

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: 1/27/2025